

AGENDA ITEM # 11

July 9, 2004

To: Delta Protection Commission

From: Margit Aramburu, Executive Director

Subject: Report from Delta Land Use Impacts Committee Regarding Review of Projects in and Near the Legal Delta
(For Commission Discussion and Possible Action)

RECOMMENDATION:

Review current recommendations of the Committee and direct the Committee and staff to continue to work on developing refinements to project review procedures and report back to the Commission at the next Commission meeting.

BACKGROUND:

At the March meeting, the Commission established a new Committee--currently called the Delta Land Use Impacts Committee (Coglianese, Kelly, van Loben Sels). The Committee met twice--in May and in July.

At the July 6, 2004 meeting staff presented the language expected to accompany the Commission's budget for FY 04-05. The language states:

The Delta Protection Commission shall report to the Legislature on or before January 10, 2005, on the status of its review of the resource management plan, or "Delta Plan", including its efforts to identify changes and growth pressures within the Primary Zone, and lands within the Secondary Zone, the development of which impacts the resources of the Primary Zone.

At the July meeting, the Committee reviewed materials describing the current project monitoring process, a list of all the projects in the Primary and Secondary Zones that have been listed on the Pending Projects Memo, and an updated list of development projects in the Secondary Zone.

RECOMMENDATIONS OF THE COMMITTEE:

- The Committee recommends that the Commission review the staff report, and direct the Committee and staff to continue working to define and refine project monitoring.
- The Committee recommended that staff continue to refine the concept of a checklist, using Option 3--the CEQA (California Environmental Quality Act) checklist as a model, and adding "in the Primary Zone" to each item.

- The Committee recommended that staff use a checklist to comment on projects outside the Primary Zone (Secondary Zone or outside the Legal Delta) that could impact the resources of the Primary Zone. This could include water quality, air quality, transportation, water outfalls and intakes, and flood control/levee projects outside the Primary Zone.
- The Committee recommended that staff expand its outreach efforts to ensure that applicants, local governments, and citizens understand which projects can be appealed to the Delta Protection Commission; for example, by sending a letter to project proponents and local governments for all projects in the Primary Zone.
- The Committee recommended that more projects proposed in the Primary Zone be presented to the Commission for review and comments. This could include projects that could be appealed to the Commission.

The following materials were prepared for the Committee to review and discuss:

I. CURRENT MONITORING PROCESS:

How does staff receive notices of projects?

Commission staff receives notices of many projects in the form of early review of projects, notices through the State Clearinghouse (Notices of Preparation, etc), agendas of Planning Commissions, Boards of Supervisors, State Agencies, press clippings, and word of mouth.

How does staff decide which projects to track?

Primary Zone:

- Most projects in the Primary Zone; exceptions would be minor projects consistent with existing General Plans and zoning (variance for property line setback within existing communities).
- Projects in the Primary Zone include a wide range, from individual docks, lot line adjustments, and use permits for ag support industries to large projects such as major land acquisitions, new wildlife refuges and new reservoirs.
- Particular focus is on land use matters, i.e. projects that would change land use in the Primary Zone, or projects that would or could impact the three key lands uses of agriculture, wildlife habitat, and recreation.

Secondary Zone and Out of Legal Delta:

- Most projects directly adjacent to the Primary Zone, such as residential development across the boundary between the Primary Zone and the Secondary Zone.
- Projects that would or could impact the three key land uses in the Primary Zone (water outfalls that could impact water quality--water quality impacts agriculture, wildlife habitat and recreation).
- Matters of regional magnitude, such as regional transportation plans.

How does staff track projects?

Commission staff obtains a project description, site plan, and location map and fills out a tracking form, which is logged, assigned a tracking number and added to the Pending Projects Memo (PPM). The PPM is updated regularly and circulated monthly to the Commission and

interested parties who have requested the PPM. The PPM is posted on the Commission's web site.

How does staff decide to submit written comments on projects?

For projects in the Primary Zone, staff does not send comments on projects that conform with existing General Plans and zoning, or that are consistent with the policies in the Land Use Plan. Staff does not send comments simply to inform local government that the project is in the Primary Zone and subject to appeal to the Commission.

Staff *does not* send letters of support for projects that carry out some of the policies of the Land Use Plan (for example habitat restoration projects that retire agricultural land).

Staff *does* send comment on projects that are not consistent with the policies in the Land Use Plan.

How does staff decide which projects should be reviewed by the Commission?

Staff tries to identify projects that are large in scope, scale and cost (such as projects that affect more than one County--CALFED Program, North Delta National Wildlife Refuge) or that set a precedent.

Can the Commissioners recommend review of a project by the Commission?

Yes; for example, Commissioner Potter requested Commission review of the Prospect Island ecosystem restoration project. Commissioner McGowan requested Commission review of the Freeport Water Project intake location.

What role does the Chair have in these decisions?

In 1995, the Commission authorized staff to comment on "small or non-controversial projects on behalf of the Commission" with the "concurrence of the Chairman". Prior to mailing comment letters, the Executive Director makes a copy available for the Chairman to review. Prior to scheduling matters on the Commission's agenda, the Executive Director confers with the Chairman.

II. CRITERIA FOR COMMENTING ON PROJECTS IN THE PRIMARY ZONE:

1. Location:

- Determine if the project is located in the Primary Zone.

2. Determine if the project could be appealed to the Commission:

- Is it "development"?
"Development" means:
 - on, in, over, or under land or water, the placement or erection of any solid material or structure;
 - discharge of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials;
 - change in the density or intensity of use of land, including, but not limited to, subdivisions pursuant to the Subdivision Map Act, and

- any other division of land including lot splits, except where the land division is brought about in connection with the purchase of the land by a public agency for public recreational or fish and wildlife uses or preservation;
- construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and
- the removal or harvesting of major vegetation other than for agricultural purposes.
- If the project is not development (appealable to the Commission) could it impact Primary Zone resources?
 "Development" does **not** include:
 - (1) All farming and ranching activities
 - (2) The maintenance, including the reconstruction of damaged parts, of structures, such as marinas, dikes, dams, levees, riprap, breakwater, causeways, bridges, ferries, bridge abutments, docks, berths, and boat sheds. "Maintenance" includes, for this purpose, the rehabilitation and reconstruction of levees to meet applicable standards of the United States Army Corps of Engineers or the Department of Water Resources.
 - (3) The construction, repair, or maintenance of farm dwellings, buildings, stock ponds, irrigation or drainage ditches, water wells, or siphons,
 - (4) The construction or maintenance of farm roads, or temporary roads for moving farm equipment.
 - (5) The dredging or discharging of dredged materials, including maintenance dredging or removal, as engaged in by any marina, port, or reclamation district, in conjunction with the normal scope of their customary operations, consistent with existing federal, state, and local laws.
 - (6) The replacement or repair of pilings in marinas, ports, and diversion facilities.
 - (7) Projects within port districts, including, but not limited to, projects for the movement, grading, and removal of bulk materials for the purpose of activities related to maritime commerce and navigation.
 - (8) The planning, approval, construction, operation, maintenance, reconstruction, alteration, or removal by a state agency or local agency of any water supply facilities or mitigation or enhancement activities undertaken in connection therewith.
 - (9) Construction, reconstruction, demolition, and land divisions within existing zoning entitlements, and development within, or adjacent to, the unincorporated towns of the delta, as permitted in the Delta Area Community Plan of Sacramento County and the General Plan of Yolo County, authorized prior to January 1, 1992.
 - (10) Exploration or extraction of gas and hydrocarbons.
 - (11) The planning, approval, construction, repair, replacement, alteration, reconstruction, operation, maintenance, or removal of oxidation and water treatment facilities owned by the City of Stockton or the City of Lodi, or facilities owned by any local agency within or adjacent to the unincorporated towns of the delta consistent with the General Plan of the County of Sacramento or the County of Yolo.

2a: If the project could be appealed to the Commission: staff should prepare a letter that states the project is located in the Primary Zone, that the project could be appealed to the Commission describing the basis and process for an appeal, and identify any observed conflicts with policies in the Act and/or Land Use Plan. The project would be added to the PPM.
Need to develop criteria for review by Commission.

2b: If the project could NOT be appealed to the Commission (state project, federal project, or identified in Delta Protection Act as NOT development): staff should prepare a letter stating the project is located in the Primary Zone, that the project could not be appealed to the Commission, and identify any observed conflicts with policies in the Act and/or Land Use Plan. The project would be added to the PPM.
Need to develop criteria for review by Commission.

3. Evaluate the Land Use Impacts of a Proposed Project Using a Checklist (see attached options for checklists): staff should use a checklist to prepare comments on environmental documents for projects in the Primary Zone and in Secondary Zone areas, the development of which impacts the resources of the Primary Zone.

Need to develop criteria for commenting on projects in the Secondary Zone.

III. CRITERIA FOR COMMENTING ON PROJECTS IN THE SECONDARY ZONE AND OUT OF THE LEGAL DELTA:

- 1. Location:** Determine project location.
- 2. Determine if the project is consistent with the *recommendations* in the Land Use Plan.**
- 3. Evaluate the Land Use Impacts of the Proposed Project Using a Checklist (see attached options for checklists).**

Issue: How to identify and track cumulative land use impacts and projects that could impact the resources and land uses in the Primary Zone.

IV. TYPES OF PROJECTS ON THE PENDING PROJECTS MEMO (1994-2003):

Types of Projects in Primary Zone:

- Wave Wall (Breakwater)/Retaining Wall
- Mitigation (permanent and seasonal wetlands habitat)
- Mobile Home
- Subdivision
- Levee Demonstration Project
- Gas Well
- Single Family Residence
- Rezone
- Quarry
- Industrial Discharge Permit
- Treated Wastewater Discharge Permit
- Marina Expansion
- Marina Improvements on Land
- Second Unit
- Increased Diversion of Drinking Water
- Pipelines: Gas, Sewage
- Seismic Upgrade of Levees
- Bridge Replacement
- Right to Farm Ordinance
- Incorporation of City of Oakley
- Application of Treated Wastewater on Jersey Island
- Floating Billboard Ordinance

- New Public Park
- Acquisition for Future Public Park
- Acquisition for Future Water Facility
- Abatement of Unauthorized Structures
- Habitat Restoration Projects
- Sand Extraction
- Reservoir/habitat
- Water Quality Plan for Bay and Estuary
- Rec Board Regulations
- Dredging
- Levee maintenance
- Natural Gas Survey
- Sacramento River Greenway Plan
- Egeria Densa/Water Hyacinth Control Program
- Highway Widening
- Highway Guardrail
- Cell Phone Tower
- Windsurf Facility
- Acoustic Fish Barrier
- Campground
- Recreational Signage
- Winery Use Permit
- Closure of Landfill
- Acquisition of Conservation Easement
- Mitigation Bank
- Mitigation for Out of Delta Activities
- Various State Regulations/Basin Plans/Regulations/General Permits
- Upgrade Existing Parks
- Grading/Aquaculture Pond
- Groundwater Remediation
- Dredge Spoils on Land
- Upgrade Bridge Structures
- Swainsons Hawk Mitigation Ordinance
- Asparagus Packing Shed
- Equestrian Center and Stable
- Barriers (South Delta)
- Sludge Ordinance
- Speed Zone
- Swimming Area
- Boathouse
- Habitat Conservation Plan
- Petroleum Spill Clean Up
- Expand Pigeon Farm

- Aquaculture Ponds
- Sand Excavation (from Water Covered Areas)
- Amendments to General Plans and Zoning Codes

Types of Projects in Secondary Zone:

- Mobile Home
- Subdivision/Rezone
- Move House off Levee
- General Plan Amendment
- New Marina
- Docks
- Levee Rehabilitation
- Recycle Center/Transfer Station
- Berth for Single Family Dwelling
- Mitigation: Riparian and Wetland Habitat
- Marina Improvements
- Trail
- Gas Well
- Ag Worker Living Unit
- Trailer Park/RV Park
- General Plan Amendment: Residential Development
- Upgrade Sewage Treatment Plant
- Enlarge Flood Control Channel
- Expand Marine Repair Facility
- Pipelines: Water, Sewage
- Mitten Crab Barrier
- Flood Control Improvements
- New Power Plant
- Hunting Club
- Dry Boat Storage
- Acquisition for Habitat Restoration
- Management Plan for Federal Wildlife Refuge
- Golf Course/Recreation Facility
- Maintenance Dredging
- Borrow Site
- Revised Sphere of Influence
- Dairy Remodel
- New Town (Mountain House)
- Wildlife Museum
- Specific Plans
- Waterfront Plan
- Annexation
- Truck Stop

- Transfer of Federal Lands to Port
- Install Dolphin
- Stormwater Treatment

List of Projects Out of Legal Delta:

- Reservoir
- Biosolids Application
- Selenium Standards
- San Joaquin River Water Acquisition
- Reconstruct Bridge
- Grasslands Bypass Project (water quality impacts)
- Discharge of Heated Water
- Mitigation
- RV Park/Campground
- Expand Railway Museum

V. OPTIONS FOR CHECKLIST:

Option One: Criteria for Commission's Land Use Plan:

- (1) Protect and preserve the cultural values and economic vitality that reflect the history, natural heritage, and human resources of the delta.
- (2) Conserve and protect the quality of renewable resources.
- (3) Preserve and protect agricultural viability.
- (4) Restore, improve, and manage levee systems by promoting strategies, including, but not limited to, methods and procedures that advance the adoption and implementation of coordinated and uniform standards among governmental agencies for the maintenance, repair, and construction of both public and private levees.
- (5) Preserve and protect delta dependent fisheries and their habitat.
- (6) Preserve and protect riparian and wetlands habitat, and promote and encourage a net increase in both the acreage and values of those resources on public lands and through voluntary cooperative arrangements with private property owners.
- (7) Preserve and protect the water quality of the delta, both for instream purposes and for human use and consumption.
- (8) Preserve and protect open-space and outdoor recreational opportunities.
- (9) Preserve and protect private property interests from trespassing and vandalism.
- (10) Preserve and protect opportunities for controlled public access and the use of public lands and waterways consistent with the protection of natural resources and private property interests.
- (11) Preserve, protect, and maintain navigation.
- (12) Protect the delta from any development that results in any significant loss of habitat or agricultural land.
- (13) Promote strategies for the funding, acquisition, and maintenance of voluntary cooperative arrangements, such as conservation easements, between property owners and conservation groups that protect wildlife habitat and agricultural land, while not impairing the integrity of levees.

- (14) Permit water reservoir and habitat development that is compatible with other uses.
- (d) A strategy for the implementation of a coordinated marine patrol system throughout the delta that will improve law enforcement and coordinate the use of resources by all jurisdictions to ensure an adequate level of public safety

Option Two: Criteria for Approving Local Government General Plan Amendments and Criteria for Interim Local Government Approvals:

- (a) Project is consistent with the resource management plan.
- (b) Project will not result in wetland or riparian loss.
- (c) Project will not result in the degradation of water quality.
- (d) Project will not result in increased nonpoint source pollution.
- (e) Project will not result in the degradation or reduction of Pacific Flyway habitat.
- (f) Project will not result in reduced public access, provided the access does not infringe on private property rights.
- (g) Project will not expose the public to increased flood hazard.
- (h) Project will not adversely impact agricultural lands or increase the potential for vandalism, trespass, or the creation of public or private nuisances on public or private land.
- (i) Project will not result in the degradation or impairment of levee integrity.
- (j) Project will not adversely impact navigation.
- (k) Project will not result in any increased requirements or restrictions upon agricultural practices in the primary zone.

RECOMMENDED: Option Three: CEQA Checklist:

(Staff will refine this checklist to use in reviewing proposed projects for Committee and Commission review and comment.)

I. AESTHETICS -- Would the project:

- a) Have a substantial adverse effect on a scenic vista in the Primary Zone?
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway in the Primary Zone?
- c) Substantially degrade the existing visual character or quality of the site and its surroundings in the Primary Zone?
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the Primary Zone?

II. AGRICULTURE RESOURCES: Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use in the Primary Zone?
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract in the Primary Zone?
- c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use in the Primary Zone?

III. AIR QUALITY -- Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan in the Primary Zone?**
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation in the Primary Zone?**
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors) in the Primary Zone?**
- d) Expose sensitive receptors to substantial pollutant concentrations in the Primary Zone?**
- e) Create objectionable odors affecting a substantial number of people in the Primary Zone?**

IV. BIOLOGICAL RESOURCES -- Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species [identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service] in the Primary Zone?**
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community [identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service] in the Primary Zone?**
- c) Have a substantial adverse effect on federally protected wetlands in the Primary Zone (Section 404 of the Clean Water Act including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites in the Primary Zone?**
- e) Conflict with any local policies or ordinances protecting biological resources in the Primary Zone, such as a tree preservation policy or ordinance?**
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan in the Primary Zone?**

V. CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource (§ 15064.5) in the Primary Zone?**
- b) Cause a substantial adverse change in the significance of an archaeological resource (§ 15064.5) in the Primary Zone?**
- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature in the Primary Zone?**
- d) Disturb any human remains, including those interred outside of formal cemeteries, in the Primary Zone?**

VI. GEOLOGY AND SOILS -- Would the project:

- a) Expose people or structures to potential substantial adverse effects in the Primary Zone, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault (Alquist-Priolo Earthquake Fault Zoning Map) or based on other substantial evidence of a known fault?
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including liquefaction?
 - iv) Landslides?
- b) Result in substantial soil erosion or the loss of topsoil in the Primary Zone?
- c) Be located on a geologic unit or soil in the Primary Zone that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- d) Be located on expansive soil in the Primary Zone (Table 18-1-B of the Uniform Building Code (1994)) creating substantial risks to life or property?
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water in the Primary Zone?

VII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

- a) Create a significant hazard to the public or the environment in the Primary Zone through the routine transport, use, or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment in the Primary Zone through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school in the Primary Zone?
- d) Be located on a site in the Primary Zone which is included on a list of hazardous materials sites and, as a result, would it create a significant hazard to the public or the environment?
- e) For a project in the Primary Zone located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- f) For a project in the Primary Zone within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan in the Primary Zone?
- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires in the Primary Zone, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

VIII. HYDROLOGY AND WATER QUALITY -- Would the project:

- a) Violate any water quality standards or waste discharge requirements in the Primary Zone?**
- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level in the Primary Zone (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**
- c) Substantially alter the existing drainage pattern of the site or Primary Zone area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**
- d) Substantially alter the existing drainage pattern of the site or Primary Zone area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**
- e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff in the Primary Zone?**
- f) Otherwise substantially degrade water quality in the Primary Zone?**
- g) Place housing within a 100-year flood hazard area in the Primary Zone?**
- h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows in the Primary Zone?**
- i) Expose people or structures in the Primary Zone to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**
- j) Inundation in the Primary Zone by seiche, tsunami, or mudflow?**

IX. LAND USE AND PLANNING - Would the project:

- a) Physically divide an established community in the Primary Zone?**
- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project in the Primary Zone (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan in the Primary Zone?**

X. MINERAL RESOURCES -- Would the project:

- a) Result in the loss of availability of a known mineral in the Primary Zone that would be of value to the region and the residents of the state?**
- b) Result in the loss of availability of a locally-important mineral resource recovery site in the Primary Zone delineated on a local general plan, specific plan or other land use plan?**

XI. NOISE -- Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies in the Primary Zone?
- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels in the Primary Zone?
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project in the Primary Zone?
- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project in the Primary Zone?
- e) For a project located within an airport land use plan or within two miles of a public airport or public use airport, would the project expose people residing or working in the project area in the Primary Zone to excessive noise levels?
- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area in the Primary Zone to excessive noise levels?

XII. POPULATION AND HOUSING -- Would the project:

- a) Induce substantial population growth in an area in the Primary Zone, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- b) Displace substantial numbers of existing housing in the Primary Zone, necessitating the construction of replacement housing elsewhere?
- c) Displace substantial numbers of people in the Primary Zone, necessitating the construction of replacement housing elsewhere?

XIII. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services in the Primary Zone:
 - Fire protection?
 - Police protection?
 - Schools?
 - Parks?
 - Other public facilities?

XIV. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities in the Primary Zone such that substantial physical deterioration of the facility would occur or be accelerated?
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities in the Primary Zone which might have an adverse physical effect on the environment?

XV. TRANSPORTATION/TRAFFIC -- Would the project:

- a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system in the Primary Zone?
- b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways in the Primary Zone?
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks in the Primary Zone?
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) in the Primary Zone?
- e) Result in inadequate emergency access in the Primary Zone?
- f) Result in inadequate parking capacity in the Primary Zone
- g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks) in the Primary Zone?

XVI. UTILITIES AND SERVICE SYSTEMS -- Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects in the Primary Zone?
- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects in the Primary Zone?
- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- g) Comply with federal, state, and local statutes and regulations related to solid waste?